

The Honorable John H. Chun

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., a Delaware
corporation; and AMAZON.COM SERVICES
LLC, a Delaware limited liability company,

Plaintiffs,

v.

YAN LI, an individual; and XIWEI CHEN, an
individual; and DOES 1-10,

Defendants.

No. 2:23-cv-00486-JHC

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' *EX PARTE* MOTION
FOR DEFAULT JUDGMENT, AND
PERMANENT INJUNCTION AGAINST
DEFENDANTS**

THIS MATTER came before the Court on the *Ex Parte* Motion for Default Judgment and Permanent Injunction (the "Motion") brought by Plaintiffs Amazon.com, Inc. and Amazon.com Services LLC (collectively, "Amazon" or "Plaintiffs") against Defendants Yan Li, and Xiwei Chen (collectively, "Defendants"). The Court, having considered Plaintiffs' Motion, this matter's files and records, the governing law, and being fully advised, finds that Plaintiffs have established the liability of Defendants and their entitlement to damages and permanent injunction. Accordingly, the Court ORDERS:

1. Plaintiffs' Motion is GRANTED and JUDGMENT is entered against Defendants on Plaintiffs' Claim for Misrepresentation of Copyright Infringement (17 U.S.C. § 512(f)).

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EX PARTE MOTION FOR DEFAULT JUDGMENT
AND PERMANENT INJUNCTION - 1
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2. The Court finds Plaintiffs' requested attorneys' fees incurrent in connection with this action to be reasonable.

3. Accordingly, the Court awards Plaintiffs monetary recovery in connection with this action in the amount of \$44,226 in attorneys' fees pursuant to 17 U.S.C. § 512(f).

4. The Clerk is directed to enter judgment against Defendants and in favor of Plaintiffs in the amount set forth above.

5. Defendants and their officers, agents, servants, employees, and attorneys, and all others in active concert or participation with them who receive actual notice of the order, are hereby permanently ENJOINED AND RESTRAINED from:

- a. Submitting to Amazon any takedown notifications based on false assertions of rights of copyright ownership by any means or otherwise violating 17 U.S.C. § 512(f), whether as written submissions, through the "Report Infringement" form, or using the "Report a Violation" tool;
- b. enrolling or attempting to enroll in Amazon Brand Registry; and
- c. assisting, aiding, or abetting any other person or entity in engaging or performing any of the activities referred to in subparagraphs (a) through (b) above.

6. The Court hereby retains jurisdiction over this case for the purpose of enforcing this Order and Injunction, and for any supplemental proceedings that may be authorized by law.

7. Plaintiffs' counsel is hereby directed to serve a copy of this Order and Injunction on Defendants' last known email addresses registered with Amazon and their payment service providers, which Plaintiffs used to complete service.

SO ORDERED this ____ day of _____, 2024.

THE HONORABLE JOHN H. CHUN
UNITED STATES DISTRICT COURT JUDGE

[PROPOSED] ORDER GRANTING PLAINTIFFS'
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[PROPOSED] ORDER GRANTING PLAINTIFFS'
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